



Arthur Sanders
Attorney

Office 845-499-2990 | E-Mail: asanders@bn-lawyers.com

April 12, 2023

Hon. Jesse M. Furman
U.S. District Court
40 Centre Street, Room 2202
New York, NY 10007

RE: Fynan v. Kavulich & Associates, P.C., et al.
Docket No. 22-cv-02892

Dear Judge Furman:

As you know, this office represents the defendants Kavulich & Associates, P.C. and Gary Kavulich (the Kavulich defendants).

This letter is written to request an extension of the existing Briefing Schedule for summary judgment motions as plaintiff's counsel and the undersigned have agreed to participate in an additional mediation. The mediation has been scheduled for May 3, 2023. It is our understanding that the co-defendants are still considering whether or not to participate in the May 3rd mediation.

In anticipation of the upcoming mediation, scheduled before Joseph DiBenedetto, I have agreed to a revised Briefing Schedule with plaintiff's counsel. Under the revised Briefing Schedule, our summary judgment motion would be due by May 17, 2023 and plaintiff's cross-motion and opposition would be due by May 31, 2023. Our reply and opposition to plaintiff's cross-motion would be due on June 14, 2023 and plaintiff's reply would be due on June 21, 2023.

Counsel for the co-defendants have agreed to the new schedule.

Thank you for your consideration.

Sincerely,

BARRON & NEWBURGER, P.C.

By: Arthur Sanders

Application GRANTED. The Clerk of Court is directed
to terminate ECF No. 54.

SO ORDERED.

April 12, 2023